

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JIM BAUGH

No. 20-mj-02398-MBB

ASSENTED-TO MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant, Jim Baugh, with the assent of the government and U.S. Probation, respectfully requests that his conditions of release be modified to permit him to travel from his current place of residence, in Little Rock, Arkansas, to Oklahoma City, Oklahoma, with advance notice and approval of the planned travel itinerary by U.S. Probation.

Mr. Baugh was arrested on this case in San Jose, California, where he had lived and worked for several years. At the time, he was already making arrangements to depart San Jose and was approved to reside with his sister in Little Rock, Arkansas, while this case is pending. Mr. Baugh's young children reside in Oklahoma City, Oklahoma, which is approximately a 5-hour drive from Little Rock.

Respectfully submitted,

JIM BAUGH
by his attorney,

/s/ William Fick
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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 25, 2020.

/s/ William Fick _____